

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

VICKI DOLAN,

Plaintiff,

v.

**PORTFOLIO RECOVERY
ASSOCIATES, LLC,**

Defendant.

:
:
:
:
:
:
:
:
:
:
:
:

CASE NO. 2:21-cv-394

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Allegheny County, Pennsylvania and in support thereof avers as follows:

1. Portfolio Recovery Associates, LLC is a defendant in a civil action originally filed on July 13, 2020 in the Court of Common Pleas of Allegheny County, Pennsylvania titled *Vicki Dolan v. Portfolio Recovery Associates, LLC* and docketed to Case No.: GD-20-007571.
2. Plaintiff filed her Complaint on February 18, 2021.
3. This removal is timely under 28 U.S.C. § 1446(b). PRA received service of Plaintiff's Complaint on February 23, 2021.
4. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all pleadings, process and orders filed in the state court action.
5. The District Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against PRA alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

6. On this date, PRA has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE, Defendant Portfolio Recovery Associates, LLC respectfully removes this case to the United States District for the Western District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: March 25, 2021

CERTIFICATE OF SERVICE

I certify that on March 25, 2021, a true copy of the foregoing document was served as follows:

Via E-mail and U.S. Mail, Postage Prepaid

Joshua P. Ward
Kyle H. Steenland
Jordan Kurth
The Law Firm of Fenters Ward
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206
JWard@FentersWard.com
KSteenland@FentersWard.com
JKurth@fentersward.com
Counsel for Plaintiff

Via Electronic Filing

Court of Common Pleas
Allegheny County
414 Grant Street
Pittsburgh, PA 15219

MESSER STRICKLER, LTD.

By: */s/ Lauren M. Burnette*
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: March 25, 2021